

1 DOUGLAS N. SMITH, SBN 78233  
2 DOUGLAS N. SMITH, INC.  
3 1207 COOMBS STREET  
4 P.O. BOX 760  
5 NAPA, CA 94559-0760  
6 Telephone: (707) 257-8935  
7 Facsimile: (707) 257-8937

8 Attorney for DEFENDANTS,  
9 LINDA J. CURTIS, Trustee of the  
10 PLKG CURTIS TRUST dated October 4, 2004

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 PAMELA KOUSSA ) Case No.: 3:16-CV-02248-MEJ  
14 v. )  
15 PHILIP J. CURTIS, Trustee of the )  
16 PLKG CURTIS TRUST dated October 4, )  
17 2004; LINDA J. CURTIS, Trustee of the )  
18 PLKG CURTIS TRUST dated October 4, )  
19 2004; AND DAVID MAGNA, DBA DAVID )  
20 MAGNA WORKSHOP, )  
21 Defendants. )  
22 )  
23 )  
24 )  
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27 )  
28 )

COME NOW, THE PARTIES, BY AND THROUGH THEIR ATTORNEYS, and hereby enter into the following stipulations for the stay of filing and scheduling deadlines due to pending settlement, with request for this court to adopt the same as the Order of the Court.

1. The Center for Disability Access represents Plaintiff PAMELA KOUSSA;
2. Douglas N. Smith of the Law Offices of Douglas N. Smith represents Defendant LINDA J. CURTIS, Trustee of the PLKG CURTIS TRUST dated October 4, 2004.
3. Defendant PHILIP J. CURTIS, Trustee of the PLKG CURTIS TRUST dated October 4, 2004 is deceased and has been dismissed from the action.
4. The Parties are working out the material details of settlement.
5. The settlement negotiated by counsel shall resolve the entire action, and shall result in

1 the dismissal of Defendant DAVID MAGNA, dba DAVID MAGNA WORKSHOP.

2 6. Defendant Curtis' Responsive Pleadings are due July 21, 2016.

3 7. Under the Court's Scheduling Order, issued April 26, 2016, pursuant to General

4 Order 56, ¶¶3, 4, the Last Day for the parties and counsel to hold the joint inspection

5 of the premises is August 8, 2016.

6 8. In the interest of judicial economy and to minimize attorney's fees and costs, the

7 parties wish to stay further proceedings, including the filing of responsive pleadings

8 by Defendants and the Case Schedule, for 30 days, to allow the parties to finalize and

9 effectuate settlement. The parties anticipate the settlement will be completed and a

10 request for dismissal filed by that time.

11 9. The parties request this court approve the above stipulation, staying the deadline for

12 Defendants to respond to the Summons and staying the Case Schedule for 30 days.

13 IT IS SO STIPULATED.

14 Date: July 21, 2016

15 CENTER FOR DISABILITY ACCESS

16 By: Phyl Grace  
17 PHYL GRACE, SBN 171771  
18 PO Box 262490  
19 San Diego CA 92196-2490  
20 Attorneys for Plaintiff KOUSSA

21 Dated July 21, 2016

22 LAW OFFICES DOUGLAS N. SMITH, INC.

23 By: Douglas N. Smith  
24 DOUGLAS N. SMITH, SBN 78233  
25 1207 Coombs Street/ PO Box 760  
26 Napa, CA 94559  
27 (707) 257-8935  
28 Attorney for Defendant CURTIS

29 **ORDER**

30 IT IS SO ORDERED.

31 Date: July 22, 2016

32   
33 MARIA-ELENA JAMES  
34 United States Magistrate Judge

1 **I hereby attest that I have on file all holographic signatures corresponding to any**  
2 **signatures indicated by a conformed signature (/S/) within this e-filed document.**

3 Dated July 21, 2016

4 LAW OFFICES DOUGLAS N. SMITH, INC.

5 By: /S/Douglas N. Smith  
6 DOUGLAS N. SMITH, SBN 78233  
7 1207 Coombs Street/ PO Box 760  
8 Napa, CA 94559  
9 (707) 257-8935  
10 Attorney for Defendant CURTIS